

**Commonwealth of Kentucky  
Division for Air Quality**

***RESPONSE TO COMMENTS***

ON THE DRAFT TITLE V PERMIT V-02-020

AK STEEL CORPORATION

ASHLAND, KENTUCKY

AUGUST 4, 2004

BRIAN SMITH, REVIEWER

PLANT I.D. # 21-019-00005

APPLICATION LOG # 56476

**RESPONSE TO COMMENTS FROM THE PUBLIC:**

On July 5, 2004, the public notice on availability of the draft permit and supporting material for comments by persons affected by AK Steel Corporation was published in *The Daily Independent* in Ashland, Kentucky. The public comment period expired on August 4, 2004.

Comments were received from AK Steel Corporation. Changes were made to the permit as a result of the comments received. These changes were made due to determinations that are explained in the Proposed Permit Statement of Basis.

The permit is now being issued as a proposed permit. U.S. EPA has 45 days from the date of the issuance to submit comments. If no comments are received during this period, the Division considers the permit final as conditioned. The Division's response to comments follows.

Comments and Suggested Revisions on the Draft Title V Permit submitted by Rick Massey of AK Steel Corporation in Ashland, Boyd County, Kentucky. The comments below have been paraphrased and otherwise altered from their original presentation to facilitate response. The unaltered comments and any supporting documents are included in their entirety at the end of this document.

**A. EP#111, Flare.**

1. AK Steel believes that the operation of a thermocouple to indicate the presence of a flame is sufficient to insure compliance and sufficient to comply with the applicable regulation. AK Steel requests that the permit be changed to allow this.

***Division's response:** The Division agrees with the request and has revised the permit accordingly.*

2. AK Steel objects to the Specific Control Equipment Operating Conditions in the permit. These requirements come from 40 CFR 60.18, which is not applicable to AK Steel.

***Division's response:** The Division agrees with AK Steel and has removed the Specific Control Equipment Operating Conditions.*

**B. EP#115, Alloy Transfer System and Vacuum Degasser.**

1. AK Steel revised the total particulate and PM<sub>10</sub> emission limitations to 2.92 tons per 12 consecutive months from the former value of 5.43 tons per 12 consecutive months. The revised value should be reflected in the final permit.

***Division's response:** The Division agrees with AK Steel's comment and has revised the emission limitation to the correct value.*

**C. EP#04, Amanda Flare.**

1. AK Steel believes that the operation of a thermocouple to indicate the presence of a flame is sufficient to insure compliance and sufficient to comply with the applicable regulation. AK Steel requests that the permit be changed to allow this.

***Division's response:** The Division agrees with the request and has revised the permit accordingly.*

2. AK Steel objects to the Specific Control Equipment Operating Conditions in the permit. These requirements come from 40 CFR 60.18, which is not applicable to AK Steel.

***Division's response:** The Division agrees with AK Steel and has removed the Specific Control Equipment Operating Conditions.*